

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants.

Case No. 04-1199-SLR

**[PROPOSED] ADDENDUM TO STIPULATED PROTECTIVE ORDER
REGARDING PRINTING ESCROWED SOURCE CODE FILES**

Pursuant to Section 8.10 of the Stipulated Protective Order, Plaintiff SRI International, Inc. (“SRI”) and defendants Internet Security Systems, Inc. (“ISS-DE”), a Delaware corporation, Internet Security Systems, Inc. (“ISS-GA”), a Georgia corporation, and Symantec Corporation, Inc. (“Symantec”) (collectively, “Defendants”) stipulate and agree that, subject to the rules below, Plaintiff shall provide Defendants with printed copies of requested files contained on Plaintiff’s source code computer and Defendants shall provide Plaintiff with printed copies of requested files contained on Defendants’ source code computers. The parties stipulate and agree that:

1. Upon request, the producing party shall produce to requesting party printed copies of requested files contained on the producing party’s source code escrow computer. The printed copies of requested files shall be produced within three business days (excluding weekends), unless the producing party and requesting party agree to an alternative time frame for production. A printed copy of a file shall clearly identify the

file path of the underlying file as well as any additional information required to uniquely identify the underlying file.

2. A request for printed copies of files shall include, on a file-by-file basis, the complete file path associated with each file. If additional information is required to uniquely identify the requested files, then the request shall include, on a file-by-file basis, such additional information. Additional file information may include: the file's version (or revision) number, the date of the version (or revision) of the file, the name of the project containing the file, the view used to locate the file, and the object ID for the file. A party may request multiple versions or revisions of the same file, but the requesting party must specify the exact dates or the exact numbers for each version or revision sought. The requesting party shall not formulate requests in terms of file directories.

3. The producing party shall have the right to object to a request within two business days (excluding weekends) of the request being received on the grounds that either (1) the request does not conform to the rules set forth in this agreement; or (2) the request is so overly broad as to be inconsistent with the source code escrow arrangements described in the Stipulated Protective Order.

4. If the producing party makes such an objection to a request for printed copies by the requesting party, the requested files shall not be printed until the parties have resolved such objection or the Court has ordered the printed copies to be produced.

5. The requesting party shall not make any electronic copy of the printed files. The requesting party shall not electronically scan any of the printed files. The requesting party shall not use optical character recognition (OCR) software to process any of the printed files.

6. The producing party shall provide to requesting party up to eight photocopies of the requested files. A request shall specify the number of photocopies desired by the requesting party (up to eight photocopies). The requesting party shall not make photocopies of the requested files. For the purposes of depositions or motion

practice, the requesting party may subsequently request a reasonable number additional copies of the requested files.

7. Unless the producing party and requesting party otherwise agree, copies of requested files shall only be possessed or viewed by those individuals otherwise authorized to view the electronic version of the requested files maintained in escrow. The requesting party shall maintain a log identifying the individual ultimately in possession of each copy of the requested files. A copy of the log shall be provided to the producing party upon request.

Dated: January 31, 2006

FISH & RICHARDSON P.C.

By: /s/ John F. Horvath

Timothy Devlin (#4241)

John F. Horvath (#4557)

919 N. Market St., Ste. 1100

P.O. Box 1114

Wilmington, DE 19889-1114

Telephone: (302) 652-5070

Facsimile: (302) 652-0607

Howard G. Pollack (CA Bar No. 162897)

Gina M. Steele (CA Bar No. 233379)

Katherine D. Prescott (CA Bar No. 215496)

Michael J. Curley (CA Bar No. 230343)

500 Arguello St., Ste. 500

Redwood City, CA 94063

Telephone: (650) 839-5070

Facsimile: (650) 839-5071

Attorneys for Plaintiff

SRI INTERNATIONAL, INC.

Dated: January 31, 2006

POTTER, ANDERSON & CORROON LLP

By: /s/ Richard L. Horwitz

Richard L. Horwitz (#2246)

David E. Moore (#3983)

Hercules Plaza

1313 North Market Street, 6th Floor

P.O. Box 951

Wilmington, DE 19899

Telephone: (302) 984-6000

Facsimile: (302) 658-1192

Holmes J. Hawkins, III / Natasha Horne

Moffitt

KING & SPALDING LLP

191 Peachtree Street N.E.

Atlanta, GA 30303-1763

Telephone: (404) 572-4600

Facsimile: (404) 572-5145

Theresa Moehlman / Jeffrey Blake

1185 Avenue of the Americas

New York, NY 10036-4003

Telephone: (212) 556-2100

Facsimile: (212) 556-2222

Attorneys for Defendant

INTERNET SECURITY SYSTEMS, INC. a

Delaware corporation and INTERNET

SECURITY SYSTEMS, INC. a Georgia

corporation

Dated: January 31, 2006

MORRIS, JAMES, HITCHENS & WILLIAMS
LLP

By: /s/ Mary B. Matterer
Richard K. Herrmann (#405)
Mary B. Matterer (#2696)
222 Delaware Avenue, 10th Floor
P. O. Box 2306
Wilmington, DE 19899-2306
Telephone: (302) 888-6800
Facsimile: (302) 571-1750

Lloyd R. Day, Jr. (*pro hac vice*)
Robert M. Galvin (*pro hac vice*)
Paul S. Grewal (*pro hac vice*)
Renee DuBord Brown (*pro hac vice*)
DAY CASEBEER MADRID &
BATCHELDER, LLP
20300 Stevens Creek Blvd.,
Suite 400
Cupertino, CA 95014
Telephone: (408) 873-0110
Facsimile: (408) 873-0220

Attorneys for Defendant
SYMANTEC CORPORATION

IT IS SO ORDERED.

Dated: _____

Honorable Sue L. Robinson
United States District Court